

LAW OFFICES OF
BILFIELD & ASSOCIATES

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Phone: 216-696-LAWS (5297)

6300 Rockside Road * Suite 204
Independence, Ohio 44131

Fax: 216-573-9725

February 20, 2017

VIA EMAIL ONLY

Madeline B. Dennis, Esq.
madeline.dennis@tuckerellis.com
Edward E. Taber, Esq.
edward.taber@tuckerellis.com
Tucker Ellis
950 Main Avenue, Ste 1100
Cleveland, Ohio 44113

Sarah E. Kutscher, Esq.
skutscher@ohioedlaw.com
David K. Smith, Esq.
dsmith@ohioedlaw.com
David S. Hirt
dhirt@ohioedlaw.com
Smith Peters Kalail Co., LPA
6480 Rockside Woods Blvd., Suite 300
Cleveland, Ohio 44131

Re: *Jane Doe #1, et al v Mayfield City School Dist. Bd of Ed, et al.*

Dear Counsel;

Enclosed please find the Plaintiffs' **Amended Notice to Take Deposition of Defendant, Cleveland Clinic Foundation dba Cleveland Clinic Sports Health, Pursuant to Rule 30(b)(6) FRCP with Duces Tecum Annexed**, which I am scheduling for March 15, 2017 to take place at Tucker Ellis. Your attention is directed to both the Amended Exhibit "A" concerning the "Matters on Which Examination is Requested" and the Amended Duces Tecum. I bold-faced the additional documents in the Amended Duces Tecum not previously stated on the original Duces Tecum, and the additional "matters on which examination is requested" on Amended Exhibit "A" similarly not stated on the original Exhibit "A".

In addition to the Clinic's 30(b)(6) witness(es) I am requesting that the following employees likewise be produced for deposition that same date immediately following the Clinic's 30(b)(6) witness(es):

From Human Resources:

1. Jill Patterson or her immediate successor in her position if Ms. Patterson is no longer employed nor available
2. J. Patrnczak or his/her immediate successor in his/her position if he/she is no longer employed nor available
3. Nancy Tichy, SR Director HR II or her immediate successor in her position if Ms. Tichy is no longer employed nor available
4. Jeff Kain aka Jeff "Kaim" (an individual at Hillcrest Hospital who received a copy of the 03/26/2003 letter from James Loewer to Dean Ochi
5. Garry Miller, Employee #820519

Upon receipt kindly advise your availability for the day on March 15, 2017 and that of the availability of the Human Resources individuals in conjunction with your 30(b)(6) witnesses and your employees. I am also available all day on March 16th if we do not finish March 15, 2017

Very truly yours,

/s/ Murray D. Bilfield

Murray D. Bilfield
BILFIELD & ASSOCIATES
MDB/srs
Enclosure

